

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

MARVIN JONES

PLAINTIFF

v.

CIVIL ACTION NO. 4:10-CV-011-P-S

TYSON FOODS, INC., et al.

DEFENDANTS

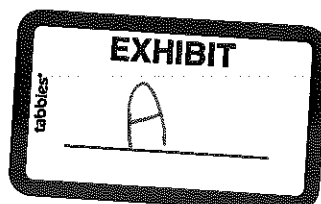
AFFIDAVIT

STATE OF MISSISSIPPI

COUNTY OF WASHINGTON

I, Lee McTeer, first being duly sworn according to law, do hereby depose and state the following:

1. That I am an adult resident citizen of the State of Mississippi, County of Washington.
2. That I am a defendant in this instant cause, I am competent to testify, and the following sworn statements are based on my personal knowledge.
3. That the Mississippi Department of Corrections has a Community Corrections Division and the Community Corrections Division is divided into three (3) Regions with each Region having a Community Corrections Director.
4. That I am employed by the Mississippi Department of Corrections (MDOC) as Community Corrections Director for Region I and have been since October 1, 2003.
5. That Region I is made up of thirty-three (33) counties in the northern portion of Mississippi including Leflore County.



6. That the Mississippi Department of Corrections (MDOC) Community Corrections Division has four (4) restitution centers in the State of Mississippi where inmates serve their sentence while working for businesses to pay for their court ordered restitution fines, room and board and court costs.
7. That the Leflore County Restitution Center (LCRC) in Greenwood, Mississippi is a MDOC owned and operated facility located in Region I.
8. That all employees at the LCRC are MDOC employees and the facility is owned and operated by MDOC.
9. That Leflore County does not own or operate the LCRC and has no authority over the facility as it is solely owned and operated by MDOC.
10. That the LCRC is funded solely by MDOC.
11. That Jonathan Bradley was the MDOC Correctional Supervisor of the Leflore County Restitution Center in Greenwood, Mississippi from December 1, 2006 until July 31, 2012, when he retired from MDOC.
12. That as the Correctional Supervisor of the Leflore County Restitution Center in Greenwood, Mississippi, Jonathan Bradley was an employee of the Mississippi Department of Corrections.

That I declare under penalty of perjury, that the above information is true and correct to the best of my knowledge and belief, further affiant sayeth not.

THIS the 27th day of September, 2013.


LEE MCTEER

Appeared before me, the undersigned Lee McTeer and stated upon his oath that the averments contained above are true and correct to the best of his knowledge, information and belief.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 27th day of September, 2013.

Beverly Chewnin
NOTARY PUBLIC

My Commission Expires _____

